2012 ANNUAL AIR MONITORING NETWORK PLAN CHECKLIST

Blue = fields that would be filled in during ANP review

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	s	ANP app? ^[1]
		within	submitte	missing or	req?	met	req. but	networ	
		40	d? If	incorrect		(assumes	ultimately	k	
		CFR	yes,			correct info	for review	adeq?	
		58	page #s			submitted)	notes <mark>)</mark>	•	
						P			
1	July 1 st due date	58.10		Request plan		ANP approval	shall submit	N	N
		(a)(1)		be submitted		can happen			
				ASAP.		within 120 days			
						of when			
						delinquent plan is received			
2	Specify monitors	58.10(a)(Specify		N/A		<u>N</u>	<u>N</u>
 _	that are part of	<u>36.10(a)(</u> 1)		monitors		1 1/A		14	<u>1X</u>
	SLAMS, NCore,	27		known of that					
	STN, State			were not					
	speciation, in			included and					
	serious, severe			request these					
	and extreme			be included in					
	ozone			the next					
	nonattainment			applicable					
	areas, PAMS, and SPM			ANP. Request					
	and SFIVI			table showing all applicable					

¹ Identify critical criteria for approval. All else is WOE. Critical is based on:

• 40 CFR 58.10 says "must include" or "shall provide"

- 40 CFR 58, App A pick the critical ones and all else WOE
- 40 CFR 58, App C ID as critical if requirement is "must"
- 40 CFR 58, App D ID as critical if requirement is "must"
- 40 CFR 58, App E none are critical since these need to be followed "to the extent possible"

Comment [e1]: I think this checklist should be year specific and get revised each year to reflect any changes occurring to the regs from the previous year.

Comment [m2]: Added year and agency to checklist

Comment [e3]: Generally speaking, I think it would be good to include an intro section to the checklist that includes clear definitions for each of the columns and instructions on how to use the checklist

Comment [m4]: Will add instructions and definitions on cheat sheet

Comment [e5]: Suggest we number each of these checks for easy to identification purposes.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" ar

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro sect

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e16]: When would request go out and in what format? I would suggest start by sending

Comment [e17]: I would suggest this to try to encourage agencies to include a table in their ANI

Comment [m18]: I included a header to specify what monitors should be addressed in the ANP. T

No.	ANP requirement	Citatio n within 40 CFR 58	Was the info submitte d? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Inform s networ k adeq?	Critical for ANP app?
3	Statement of purpose for each monitor	58.10 (a)(1)		Add/correct in following year's plan	Yes if correct info was submitted	No impact on current year's approval	Shall include	N	N
Etc.	30-day public comment / inspection period ²	58.10 (a)(1), 58.10 (a)(2)		Put out for comment and resubmit		EPA provide comment period	Shall/must provide	N	Y
	modifications to SLAMS network	58.10 (a)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	N/A – req. met if correct info submitted	Subject to approval by RA	N	Y
	NCore plan submitted to Admin. by 7/1/2009	58.10 (a)(3)		Ask for plan ASAP	N/A – HQ app.	N/A – HQ app.	Shall HQ app.	N	N
	NCore site operational by 1/1/2011	58.10 (a)(3)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for HQ app.	N	Y

² Comment period required by either EPA or S/L/T agency if modifications are proposed to the SLAMS network. Otherwise an inspection period is required by the S/L/T agency.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e19]: I would suggest we describe here how the agency went about meeting this requirement. For example, we can say something like "included in detailed site description tables" or "included in separate section."

Comment [m20]: We can work this out in the implementation of the checklist.

Comment [e21]: Literally speaking, it is not necessary that this be provided as a list.

Comment [m22]: ok

Comment [e23]: If agencies are able to provide sufficient justification in the ANP for modification

Comment [e24]: The NO2 response language developed for this year's plan specifically states tl

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
		within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes	networ k adeq?	
	Pb plan for ≥1.0 tpy sources by 7/1/2009	58.10 (a)(4)		Ask for (correct) plan ASAP and withhold approval of that portion		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
	Pb site for ≥1.0 tpy sources operational by 1/1/2010	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for 	Y	Y
	Pb plan for 0.5- 1.0 tpy by 7/1/2011	58.10 (a)(4)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
	Pb site for 0.5-1.0 tpy sources operational by 12/27/2011	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for 	Y	Y
	NO2 plan for area-wide and RA40 sites by 7/1/2012	58.10 (a)(5)		Ask for sites to be identified in 2013 ANP.plan ASAP		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e25]: I'm unsure of the purpose of this here and for the rest of the NO2 related checks just below.

Meredith- can you explain how we might use this?

Comment [m26]: This is just indicating that the language for this is "shall" (vs. should) so it's required but that it's HQ approval so it is not critical for our ANP approval.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	<mark>info</mark>	info is	meet the	req. is not	now on	S	ANP app? ^[1]
		within	submitte	missing or	req?	met	req. but	networ	
		40	d? If	incorrect		(assumes	ultimately	k	,
		CFR	yes,			correct info	for review	adeq?	
		58	page #s			submitted)	notes)		
	NO2 area-wide	58.10		Ask for		Withhold	Plan shall	Y	N¥
	and RA40 sites	(a)(5)		confirmation		approval of that	provide for		
	operational by			of operation in		portion			
	1/1/2013			2013 ANPdd/correct					
				in following					
				year's plan and					
				withhold					
				approval of					
				that portion.					
	NO2 plan for	58.10		Ask for plan		2012: Withhold	Shall	N	N
	near-road sites by	(a)(5)		that goes		approval of that	HQ app.		
	<u>7/1/2012</u> ?			through public		portion since			
·	NO2	50.10		notice ASAP		HQ app. Withhold	Plan shall	Y	N T X Z
	NO2 near-road sites operational	58.10 (a)(5)		Include Add/co		approval of that	provide for	Y	N¥
I.	by ?	(a)(3)		following		portion ?	-		
i	by .			year's ANP or		portion :			
				separate plan					
				when					
				submittedand					
				withhold					
				approval of					
l 	GO2 1 6	50.10		that portion		TC d 1 1 1 1	C1 11	NT	37
	SO2 plan for	58.10		Ask for plan ASAP		If the submitted	Shall	N	Y
	PWEI sites by 2011	(a)(6)		ASAP		plan does not meet the			
	2011					requirements:			
						withhold			
						approval of that			
						portion			

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e29]: I don't think we could consider this a critical criteria for R9's ANP approval, this year at least. If the regs change to make this an RA approval, then I would say it becomes critical.

Comment [mk30]: Critical is defined as anything required by reg – we'll change this when

Comment [e27]: This is already specified in "Action if req. is not met" column.

Comment [mk28]: I think this is creating confusion because it is a placeholder for future pl

Comment [e31]: Since CFR currently states this, I think it is fine to specify this date. Next year if v

Comment [e32]: Again, I don't think we could consider this critical in our regional review this year.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n within 40 CFR 58	info submitte d? If yes, page #s	info is missing or incorrect	meet the req?	req. is not met (assumes correct info submitted)	now on req. but ultimately for review notes)	s networ k adeq?	ANP app? ¹
	SO2 sites operational by 1/1/2013	58.10 (a)(6) and 58.13(d)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for	Y	Y
	CO plan for 2015 near-road sites by 7/1/2014	58.10 (a)(7) and 58.13(e)(1)		Ask for plan by 7/1/2014ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion To be determined for 7/1/2014 plan reviews.	Shall	N	N¥
	CO sites operational by 1/1/201 <u>5</u> 6	58.10 (a)(72) and 58.13(e)(1)		Add/correctInc lude in following year's ANP or separate plan when submitted.and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for	N¥	N¥
	CO plan for 2017 near-road sites by 7/1/2016	58.10 (a)(7) and 58.13(e)(2)		Ask for plan by 7/1/2016		To be determined for 7/1/2016 plan reviews.	?	N	N

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered crticial.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e35]: Again, unsure of what the notes in this column means here and for other CO check

Comment [e36]: Change to Y for 2014 ANP.

Comment [e37]: Not critical for 2012 plans,

Comment [e33]: Alternatively, since this is n

Comment [e34]: When the time comes, I

Comment [e38]: Change to Y for 2014 ANP.

Comment [e39]: Not critical for 2012 networ

Comment [e41]: Change to Y for 2016 ANP.

Comment [e42]: Becomes critical for 2016

Comment [e40]: Alternatively, since this is n

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
		within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes	networ k adeq?	
	<u>CO sites</u>	<u>58.10</u>		Include in		Withhold	2	N	N
	operational by 1/1/2017	(a)(7) and 58.13(e)(2)		following year's ANP or separate plan when submitted.		approval of that portion			
	AQS site identification number for each existing and	58.10 (b)(1)		Add/correct in following year's plan and withhold	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	proposed site	•••••		approval of that portion					
	Location of each existing and proposed site: street address and geographic coordinates	58.10 (b)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Sampling and analysis method(s) for each measured parameter	58.10 (b)(3)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	N	Y
	Operating schedule for each monitor	58.10 (b)(4)		Add/correct in following year's plan and withhold approval of that portion		If operating schedule does not meet req: withhold approval of that portion (can be monitor	Must contain following information	Y	Y

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e43]: Change to Y for 2016 ANP.

Comment [e44]: Becomes critical for 2016 ANP.

Comment [g46]: Should the 58.10 stuff be combined with the App. D 1.1 stuff? (Like, all the stuff they might have in the individual site tables could be grouped together in this checklist?)

Comment [e47]: I am confused at the meaning of this for this column.

Comment [e45]: Including for consistency with CFR language.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n within 40 CFR 58	info submitte d? If yes, page #s	info is missing or incorrect	meet the req?	req. is not met (assumes correct info submitted)	now on req. but ultimately for review notes	s networ k adeq?	ANP app?
	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	specific) N/A – req. met if correct info submitted	Must contain following information	N	Y
	Monitoring objectives ³ for each monitor as defined in Appendix D	58.10(b)(6); App. D		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Scale of representativenes s for each monitor as defined in Appendix D			Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in Part 58.30	58.10 (b)(7)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y

³ Site type is considered later.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e48]: I would think this to be a Y here. It would help to define up front what this column is speaking to.

Comment [mk49]: Monitoring objective are: 1. inform public, 2. NAAQS comp, and 3. research. We don't need to consider these to determine network adequacy unless we take 1 and 3 out of our consideration for reg. decisions.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	s	ANP app? ¹
		within	submitte d? If	missing or	req?	met	req. but ultimately	networ	
		40 CFR	ves,	incorrect		(assumes correct info	for review	k adeq?	
		58	page #s			submitted)	notes)	aucq.	
			pages			54.521110004	220000)		
	MSA, CBSA,	58.10		Add/correct in	Yes if correct	N/A – req. met	Must contain	N	Y
	CSA or other area represented	(b)(8)		following year's plan and	info was submitted	if correct info submitted	following information		
	by the monitor			withhold	submitted	sublifitted	Illiormation		
				approval of					
	The designation	58.10		that portion Add/correct in	Yes if correct	N/A – req. met	Must contain	Y	Y
	of any Pb	(b)(9)		following	info was	if correct info	following	1	1
	monitors as either			year's plan and	submitted	submitted	information		
	source-oriented or non-source-			withhold approval of					
	oriented			that portion					
	Any source-	58.10		Add/correct in	Yes if correct	N/A – req. met	Must contain	Y	Y
	oriented Pb site for which a	(b)(10)		following year's plan and	info was submitted	if correct info submitted	following information		
	waiver has been			withhold	submitted	submitted	information		
	granted by EPA			approval of					
	RA Any Pb monitor	58.10		that portion Add/correct in	Yes if correct	N/A – req. met	Must contain	Y	Y
	for which a	(b)(11)		following	info was	if correct info	following	1	1
	waiver has been			year's plan and	submitted	submitted	information		
	requested or granted by EPA			withhold approval of					
	RA for us of Pb-			that portion					
	PM10 in lieu of			1					
	Pb-TSP Identification of	58.10		Add/correct in		Withhold	Must contain	Y	Y
	required NO2	58.10 (b)(12)		following		approval of that	Must contain following	I	I
	monitors as either	(3)(12)		year's		portion ? (HQ).	information		/
	near-road or area-			ANP.plan and					
I <u> </u>	wide		L	withhold					

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e50]: Again, I can envision a Y here since several of our minimum monitoring requirements are assigned at the CBSA/MSA level.

Comment [e51]: I know this is a tricky one, but I actually do believe it would be appropriate in this case for R9 to be the one to withhold approval since this is a requirement for the ANP which goes to the RA. To me, this requirement is simply stating that he S/L agencies are required to identify the number of near-road and area-wide monitors they should be operating.

Comment [e52]: Again, confused by this column.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n within 40 CFR 58	info submitte d? If yes, page #s	info is missing or incorrect	meet the req?	req. is not met (assumes correct info submitted)	now on req. but ultimately for review notes)	s networ k adeq?	ANP app? ¹
				approval of that portion					
	Document how states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor.4	58.10 (c)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	If the process for the review of changes to the PM2.5 network does not meet the req: withhold approval of that portion.	must	N	Y
	Plan to modify the network that complies with findings of the 5- year network assessment. [Note: can be submitted on year of network assessment or year after.]	58.10 (e) 58.14 (a)	Only applies to year of or after 5- year network assessment	Add/correct in following year's plan and withhold approval of that portion	Yes if plan was submitted, either with ANP or separately	If the plan would result in not meeting other requirements then withhold approval of that portion.	Shall develop and implement. Final plan subject to approval by RA.	N	N
	All additions and discontinuations of SLAMS have	58.10 (e)		Withhold approval of that portion.		If modification does not meet req: withhold		Y for some sites:	Y

⁴ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

Comment [e5]: Suggest we number each of these checks for easy to identification purposes.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e55]: I could say Y here since a plan with modifications should allow for the network to remain adequate.

Comment [mk56]: I don't think this vague plan would be reliable enough to base any network adequacy decisions on but I agree with this concept and so I changed the req. to tell us about changes to the network within 18 mos. to yes.

Comment [e53]: I see the logic, but don't see how it is required to be submitted on a particular date. A date needs to be clarified in the regs.

Comment [mk54]: Modified language to be a recommendation.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ^[1]
		within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes	networ k adeq?	
	been subject to approval according to 58.14			Work separately with agency to obtain information needed to approve modification and approve outside ANP process. List in following year's plan.		approval of that portion.		DV, high conc, co- located, etc.	
	Data submitted to AQS	58.16		for ANP			No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
	Precision/Accura cy reports submitted to AQS	App. A		Add/correct in following year's plan.		N/A – req. met if correct info submitted	Must => WOE	N	N
	Annual data certification submitted	App. A		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	Must => WOE	Y	Y
	Frequency of flow rate	App A, 3.3.2		Add/correct in following		If frequency does not meet	Must => WOE	WOE	

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [m57]: This is not required to be in ANP and I don't know how we'd check so I suggest removing

Comment [e58]: Agree.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
	•	within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes	networ k adeq?	
	verification for manual PM samplers audit			year's plan.		requirement then withhold approval of that portion.			
	Frequency of flow rate verification for automated PM analyzers audit	App A, 3.2.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
	Frequency of one-point flow rate verification for Pb samplers audit	App A, 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Frequency of one-point QC check (gaseous)	App. A, 3.2.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Date of last Annual Performance Evaluation (gaseous)	App. A, 3.2.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Dates of last two semi-annual flow rate audits for	App A 3.2.4 and 3.3.3		Add/correct in following year's plan.		If frequency does not meet requirement	Must => WOE		

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	<mark>info</mark>	info is	meet the	req. is not	now on	S	ANP app?[1]
		within	submitte	missing or	req?	met	req. but	networ	
		40	d? If	incorrect		(assumes	ultimately	k	\
		CFR	yes,			correct info	for review	adeq?	
		58	page #s			submitted)	notes	1	
			puges			54.02.11.0000	110000)		
	PM monitors					then withhold			
						approval of that			
						portion.			
	Dates of last two	App A		Add/correct in		If frequency	Must =>		
	semi-annual flow	3.3.4.1		following		does not meet	WOE		
	rate audits for Pb			year's plan.		requirement			
	monitors					then withhold			
						approval of that			
						portion.			
	PM2.5 co-			Add/correct in		If co-location	Must =>	Y	Y
	location			following		does not meet	WOE		
				year's plan and		requirement			
				withhold		then withhold			
				approval of		approval of that			
				that portion.		portion.			
	PM10 co-location			Add/correct in		If co-location	Must =>	Y	Y
				following		does not meet	WOE		
				year's plan and		requirement			
				withhold		then withhold			
				approval of		approval of that			
	Dl l ('	A A		that portion.		portion.	Mari	37	V
	Pb co-location	App. A		Add/correct in		If co-location	Must =>	Y	Y
		3.3.4.3		following		does not meet	WOE		
				year's plan and withhold		requirement then withhold			
				approval of that portion.		approval of that portion.			
	PM10-2.5 co-	Ann A		Add/correct in		If co-location	Must =>	N	N
	location	App. A 3.3.6		following		does not meet	WOE	11	IN .
	iocation	5.5.0		year's plan. <u>If</u>			WOE		
				site hosted,		requirement then withhold			
ı L		l	L	one nosicu,		then withhold	<u> </u>	L	

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [m59]: Is PM10 co-location required?

Comment [e60]:

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n within 40 CFR 58	info submitte d? If yes, page #s	info is missing or incorrect	meet the req?	req. is not met (assumes correct info submitted)	now on req. but ultimately for review notes	s networ k adeq?	ANP app? ^[]
				may request for this to be included in next applicable plan.		approval of that portion N/A-HQ action			
	PM2.5 PEP audits Pb PEP audits	App. A (3.2.7) App. A		Check EPA records. Check EPA	EPA requirement EPA	EPA adjusts schedule EPA adjusts	EPA req.	Y Y	N N
	NPAP audit	(3.3.4.4) App. A (?)		records. Check EPA records.	requirement EPA requirement	schedule EPA adjusts schedule	EPA req.	Y	N
	Instrument/monit oring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	must	Y	Y
	Optional request to have PM2.5 continuous instruments treated as non- FEMs and therefore not comparable to NAAQS?	Proposed rule and memo		Assume all FEM instruments are comparable to NAAQS (see previous item)		If the evidence to treat FEMs as non-FEMs is not compelling: withhold approval of that portion and treat all FEMs as regulatory		Y	Y if request is included

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e61]: Since this is handled on a national scale, I don't think we could take action on this at the regional level unless HQ specifically asked the region to include a comment. I think all we could ask for is that if an agency was hosting one of these collocations, they should include this in the ANP.

Comment [m63]: Are any of these App. A requirements critical vs WOE?

Comment [mk64]: No – all of App. A is moving to WOE.

Comment [m62]: Need this ref.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n within 40 CFR 58	info submitte d? If yes, page #s	info is missing or incorrect	meet the req?	req. is not met (assumes correct info submitted)	now on req. but ultimately for review notes	s networ k adeq?	ANP app? ^[]
						•.			
	Start date for each monitor	App. C		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	monitors N/A – req. met if correct info submitted	Must	Y – info is needed for valid DV determ. but can be obtained from AQS	Y
	Instrument monitor type for each monitor			Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		Y – ID non-reg. monitors	Y
	Monitoring objective for each instrument	App. D 1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	N	Y
	Site type for each instrument	App. D 1.1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	Y
	Instrument parameter code			Add/correct in following	Yes if correct info was	N/A – req. met if correct info		Y	Y

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
		within	submitte	missing or	req?	met	req. but	networ	
		40	d? If	incorrect		(assumes	ultimately	k	
		CFR	yes,			correct info	for review	adeq?	
		58	page #s			submitted)	notes)		
	for each			year's plan and	submitted	submitted			
	instrument			withhold approval of					
				that portion.					
	Instrument			Add/correct in	Yes if correct	N/A – req. met		N	N
	parameter			following	info was	if correct info			
	occurrence code			year's plan.	submitted	submitted			
	for each								
	instrument								
	Sampling season	App. D		Add/correct in		If sampling	must	Y	Y
				following year's plan and		season does not meet			
				withhold		requirements or			
				approval of		a deviation has			
				that portion.		not been			
						approved:			
						withhold			
						approval of that			
	Sampling	58.12(d)		Add/correct in		portion If sampling	must	Y	Y
	schedule for	36.12(u)		following		schedule does	must	1	1
	PM2.5			year's plan and		not meet			
				withhold		requirements or			
				approval of		a deviation has			
				that portion.		not been			
						approved:			
						withhold approval of that			
						portion			
	Sampling	58.12(e)		Add/correct in		If sampling	must	Y	Y
	schedule for	(-)		following		schedule does			

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [m65]: Needed for PM2.5? Maybe just change this to PM2.5 POC?

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
	_	within	submitte	missing or	req?	met	req. but	networ	
		40	d? If	incorrect		(assumes	ultimately	k	
		CFR	yes,			correct info	for review	adeq?	
		58	page #s			submitted)	notes		
			page //s			Submitted	Hotes		
	PM10			year's plan and		not meet			
				withhold		requirements or			
				approval of		a deviation has			
				that portion.		not been			
						approved:			
						withhold			
						approval of that			
						portion			
	Sampling	58.12(b)		Add/correct in		If sampling	Must collect	Y	Y
	schedule for Pb			following		schedule does	at 1:6 unless		
				year's plan and		not meet	waiver		
				withhold		requirements or			
				approval of		a deviation has			
				that portion.		not been			
						approved: withhold			
						approval of that			
						portion			
	Sampling	58.12(f)		Add/correct in		If sampling	Must collect	N	Y
	schedule for	30.12(1)		following		schedule does	at 1:6 unless	11	1
	PM10-2.5			year's plan and		not meet	waiver		
				withhold		requirements or			
				approval of		a deviation has			
				that portion.		not been			
						approved:			
						withhold			
						approval of that			
						portion			
	Minimum	App. D		Add/correct in		If minimum	must	Y	Y
	monitoring			following		monitoring			
	requirements met			year's plan and		requirements			
	for O3			withhold		are not met:			

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
		within	submitte	missing or	req?	met	req. but	networ	
		40	d? If	incorrect		(assumes	ultimately	k	
		CFR	yes,			correct info	for review	adeq?	
		58	page #s			submitted)	notes)		
				approval of		withhold			
				that portion.		approval of that			
1	201					portion			₩ db ~
	Minimum	App. D		Add/correct in		If minimum	must	Y	<u>YN</u>
	monitoring requirements met			following year's plan and		monitoring requirements			
	for NO2			withhold		are not met:			
	1011102			approval of		withhold			
				that portion.		approval of that			
				-		portion			
	Minimum	App. D		Add/correct in		If minimum	must	Y	Y
	monitoring	section		following		monitoring			
	requirements met	4.4		year's plan and		requirements			
	for SO2			withhold approval of		are not met: withhold			
				that portion.		approval of that			
				that portion.		portion			
	Reporting/collect	58.12(g),				Portion	No		
	ing max 5 minute	58.16(g)					regulatory	L	
	average per hour						req. in 58.10		
	for SO2						or App A, C,		
							D, or E for		
ı 	Minimum	Ann D		Add/correct in		If minimum	this in ANP	NV	N Y
I	monitoring	App. D		following		monitoring	must	<u>N</u> ¥	<u>N</u> T
	requirements met			year's plan and		requirements			
	for CO			withhold		are not met:			
				approval of		withhold			
				that portion.		approval of that			
						portion			
	Minimum	App. D		Add/correct in		If minimum	must	Y	Y

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e66]: I don't think we have the authority to judge this in 2012 plans.

Comment [m67]: This is not required to be in ANP and I don't know how we'd check so I suggest removing

Comment [e68]: These won't begin to kick in until 2014 ANP reviews.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	<u>info</u>	info is	meet the	req. is not	now on	s	ANP app? ¹
		within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes	networ k adeq?	
	monitoring requirements met for Pb, including for Pb at NCore	section 4.5; 58.13(a)		following year's plan and withhold approval of that portion.		monitoring requirements are not met: withhold approval of that portion			
	Minimum monitoring requirements met for PM2.5	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Minimum monitoring requirements met for PM10	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Minimum monitoring requirements met for PM10-2.5			Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	N	Y
	Distance of site from nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action or document	followed to the maximum extent	N	N

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	<mark>info</mark>	info is	meet the	req. is not	now on	S	ANP app? ¹
		within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes	networ k adeq?	
						deviation in waiver request.	possible		
	Traffic count of nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Groundcover	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Probe height	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from supporting structure	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from obstructions on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from obstructions not on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent	N	N

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e69]: Same comment for remainder of App. E checks.

No.	ANP	Citatio	Was the	Action if	Does it	Action if	Notes (for	Inform	Critical for
	requirement	n	info	info is	meet the	req. is not	now on	S	ANP app? ¹
		within 40 CFR 58	submitte d? If yes, page #s	missing or incorrect	req?	met (assumes correct info submitted)	req. but ultimately for review notes)	networ k adeq?	
							possible		
	Distance from trees	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance to furnace or incinerator flue	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance between collocated monitors	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Unrestricted airflow	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Probe material (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Residence time (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered critical.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Use a weight of evidence approach.

Based on the information that is in the Annual Network Plan, EPA has determined that the Annual Network Plan meets the requirements listed in 40 CFR 58.10, except for ...

Identify action if deficient (request for next-year's plan, disapprove portion, address issue and resubmit, etc.)

Identify which have to be met for network adequacy vs. ANP approval (if there is a difference) or just which inform network adequacy.

Comment [m70]: Use R1 language for this.

Comment [e71]: I like that these instructions are provided, however I would like to see them in more of a step by step fashion and in more detail.